

AFFIDAVIT OF APRIL H. COLLINS

COMES the affiant and affirms, under penalty of perjury under the laws of the United States, that the following is true and correct to the best of my information and belief:

1. My name is April H. Collins and I am over the age of nineteen (19) years. I have personal knowledge of the matters set forth in this affidavit.
2. I am an attorney licensed to practice law in the state of Alabama.
3. Prior to practicing law, I was a federal investigator with the U.S. Department of Housing and Urban Development's (HUD) Office of Fair Housing and Equal Opportunity (FHEO).
4. As a part of my duties with HUD, I investigated cases of housing discrimination in several southeastern states. I also regularly reviewed Fair Housing Assessments and other submissions required by federally funded entities.
5. On or about March 1, 2019, Mr. Michael Threatt, Executive Director of the Sylacauga Housing Authority contacted me to discuss providing a fair housing assessment of the housing authority. I believed this contact to be made based upon my experience as a HUD employee, and not in my role as an attorney.
6. On March 6, 2019, I met with Mr. Threatt at the Sylacauga Housing Authority to discuss Mr. Threatt's request for a fair housing assessment. Mr. Richard Rice attended the meeting as well. The meeting included a tour of the city of Sylacauga. This was the only meeting I had with Mr. Threatt.
7. After the meeting, Mr. Threatt emailed a Scope of Work and the AFFH Rule Guidebook. After reviewing the Scope of Work, I informed Mr. Threatt by email that I did not think it was feasible to perform the Fair Housing Assessment with the limited resources

and time. Michael and I did not verbally discuss the Scope of Work document he presented.

This was the last communication I had with Mr. Threatt regarding the assessment.

8. The proposed Scope of Work did not pertain to any employment matters nor did it reveal any internal HR practices, policies, operations, or procedures.

9. There was no agreement to perform the Fair Housing Assessment, and there was never any discussion regarding Mr. Threatt's employment relationship with the Sylacauga Housing Authority.

10. I have never received any privileged or confidential information from Michael Threatt regarding the Sylacauga Housing Authority, nor have I spoken with any SHA Board members or employees about the operations of Sylacauga Housing Authority.

11. I have never held an attorney-client relationship with the Sylacauga Housing Authority, nor did I perform any work for the SHA.

I declare the foregoing to be true and correct under penalty of perjury.

Executed this the 21st day of October, 2020.

April H. Collins
April H. Collins (HOU021)

Before me, the undersigned authority, a Notary Public in and for said State and County, personally appeared April H. Collins who being by me first duly sworn, deposes and says on oath as follows: that she has read the foregoing affidavit and that the statements made therein are true and correct, and that she knows of her own knowledge that they are correct.

Sworn to and subscribed before me this the 21st day of October, 2020.

Harold Reed

Notary Public

My commission expires: 9/12/2023